

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Northern Division**

KELLY JORDAN

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Plaintiff

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CIVIL ACTION NO.: 1:23-CV-03413

V

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**MAYOR & CITY COUNCIL OF
BALTIMORE CITY, et al.**

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Defendants

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PLAINTIFF'S MOTION TO REMAND

NOW COMES Plaintiff Kelly Jordan, personal representative of the Estate of Marcus Martin, by and through her attorneys Brandon C. James, Esq., and the James Legal Group, LLC, and files this Motion to Remand pursuant to 28 USCS § 1367 (c), and in support thereof states:

1. On October 27, 2023, Plaintiff filed a Complaint in the Circuit Court of Maryland for Baltimore City alleging: (1) a survival action, (2) excessive force/police brutality, (3) battery, (4) negligent, training, and supervision, (5) violation of Maryland constitution, (6) deprivation of civil rights, (7) due process, and a (8) Monell Claim.
2. On December 18, 2023, Defendant Mayor & City Council of Baltimore City (“Baltimore City”), and the Baltimore City Police Department (“Police Department”) removed this case to the United States District Court of Maryland.
3. Plaintiff opposed the removal and moves this Honorable Court to remand this matter to the Circuit Court of Maryland for Baltimore City pursuant to 28 USCS § 1367 (c)(2) because the state law claims substantially predominates over the claims over which the district court has original jurisdiction.

Respectfully submitted,

/s/ _____

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